

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

\*\*\*\*\*

**In re:**

**Keith Gorman,  
Debtor**

**Chapter 11  
Case No. 22-10563-BAH**

\*\*\*\*\*

**RESPONSE OF FRANCIS AND PATRICIA PROVENCHER  
TO MOTION FOR ORDER AUTHORIZING CERTAIN BORROWING [D.E. 113]**

NOW COME Francis and Patricia Provencher (the “Provenchers”), by their attorneys Ford, McDonald & Borden, P.A. and respond to the Debtor’s Motion for Order Authorizing Debtor to Enter into Borrowing Arrangement with Marietta M. Paquette on a Secured Basis (the “Motion”)[D.E. 104] and in support thereof say as follows:

1. The Provenchers support the relief requested in the Motion.

**WHEREFORE**, The Provenchers respectfully request that this Honorable Court order and decree as follows:

- A. That the motion be granted; and
- B. Grant such other and further relief as may be just and equitable.

Respectfully submitted,  
FRANCIS AND PATRICIA PROVENCHER

By their attorneys,  
FORD, MCDONALD & BORDEN, P.A.

Dated: April 28, 2023

By: /s/ Edmond J. Ford  
Edmond J. Ford, Esquire (BNH 01217)  
10 Pleasant Street, Suite 400  
Portsmouth, NH 03801  
Telephone: 603-373-1737  
Facsimile: 603-242-1381  
[eford@fordlaw.com](mailto:eford@fordlaw.com)

**CERTIFICATE OF SERVICE**

On April 28, 2023, I electronically filed this document through the CM/ECF system, which will send a notice of electronic filing to:

William S. Gannon  
William S. Gannon PLLC  
740 Chestnut Street  
Manchester, NH 03104  
bgannon@gannonlawfirm.com

Office of the U.S. Trustee  
James C. Cleveland Building  
53 Pleasant Street, Suite 2300  
Concord, NH 03301  
USTPRegion01.MR.ECF@usdoj.gov

*/s/ Edmond J. Ford*  
Edmond J. Ford, Esquire